

Site: Sydney Verona
ID #: 120007458154
Break: 10.6
Other: AS/D

Docket No.

40033326
SUPERFUND RECORDS

Mr. Dennis Degner
Page 2
August 12, 1981

It is my understanding that this notification is sufficient to amend the BHS, Inc. application to include the above mentioned options which have been used at the facility prior to 19 November 1980. Also, that BHS can continue to use the described facilities. Please contact me as soon as possible if this is an incorrect understanding.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ben Moore".

Ben Moore
Technical Consultant

cc: Mike Gill

FINDINGS OF FACT

1. Syntex Agribusiness, Inc., is a Delaware corporation authorized to do business in the State of Missouri.
2. Syntex is the present owner and operator of the facility herein described, and was, at the times of storage, treatment, and/or disposal of the substances referred to herein the owner and/or operator of said facility.
3. The facility is commonly referred to as the Syntex Agribusiness, Inc., Verona Plant, and is located on First Street, Verona, Lawrence County, Missouri, specifically described as: SE 1/4, NE 1/4, Section 17, Township 26N, Range 26 West, Latitude 37° 48 mins. 00 secs., Longitude 93° 57 mins., 40 secs.
4. On August 6, 1982, EPA and Respondent signed a consent order pursuant to the authority of Section 3013 of the Resource Conservation and Recovery Act of 1976, as amended, 42 U.S.C. 6934, for the monitoring, testing, analyses and reporting of tetrachlorodibenzo-p-dioxin (TCDD) contamination. Samples were taken from fish in the Spring River and from soil at four locations at the facility where EPA had cause to believe TCDD-contaminated wastes had been disposed of. The final report prepared by Respondent pursuant to this order (hereinafter referred to as 3013 Report) confirms the presence of TCDD at these sites and in fish in the Spring River.
5. The following disposal areas are known as: Syntex trenches, lagoon area, slough area, burn area, NEPACCO irrigation area and spill area. (See Attachment 1.)

Mr. Dennis Degner

-2-

July 30, 1980

The 55 gallon drums were marked according to their category and a list of all chemicals inside attached to the drum or manifest.

The chemicals disposed of were a potpourri that would be comparable to a chemical suppliers inventory.

As of July 1, 1980 the chemicals that can be landfilled have been limited to non-flammable, non-reactive waste.

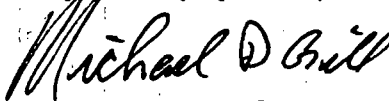
The pesticide standards were packaged in the same manner as the lab chemicals. No ignitable or liquid pesticides standards were disposed of in the past six months. Again the list of different pesticides was quite extensive.

Another question that arose was in describing the change in waste accepted after July 1, 1980. Some of the wastes indicated on the notification form (ie. toluene, xylene) can no longer be disposed of at B.H.S., Inc. It should also be noted that the chemicals indicated in section IX (c) were not disposed of in pure form but were dirt, dusts and materials contaminated with the chemical. I am enclosing a copy of Missouri's hazardous waste management law and rules which indicates what can and cannot be landfilled in Missouri. B.H.S., Inc. will follow these guidelines even though the Federal regulations may be less stringent in some areas.

I hope this answers all your questions and fulfills B.H.S., Inc. notification obligation. If you have any questions, please give me a call.

Incidentally as I mentioned, we received three notification packets. I have enclosed all three labels from the packets. Please let us know which is the correct number. Thank you.

Very truly yours,


Michael D. Gill
Manager

MDG/ph

enc.

6. The Syntex trenches are located approximately 500 feet upgradient from the Spring River in the northwest corner of the facility. A series of five (5) unlined trenches were used to dispose of waste materials from the facility's production processes.

7. The trench area is characterized by permeable residuum and solutionally weathered bedrock which lends itself to movement of substances coming in contact with water percolating through the soil and bedrock.

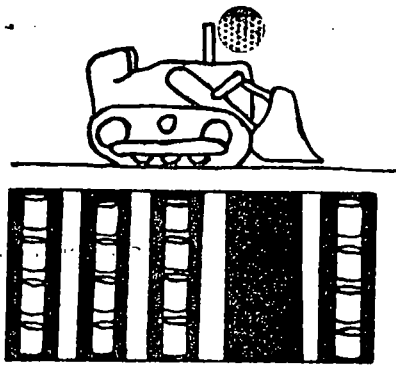
8. The Respondent's 3013 report shows the following total tetrachlorodibenzo-p-dioxins (22 isomers) concentrations (expressed in parts per billion (ppb)) have been found at the Syntex trenches (See Attachment 2.):

Total TCDD	0.033 to 69 ppb (range)
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9. The lagoon area is located in the floodplain of the Spring River approximately 500 feet from that same River. (See Attachment 1.) These four (4) separate unlined lagoons received wastewater for disposal from various production processes at the facility.

10. The Respondent's 3013 report shows the following total TCDD-concentrations at the Hoffman-Taff lagoons and EPA analysis of split samples have detected 2,4,5-trichlorophenol (TCP) (See Attachment 3.):

Total TCDD	0.41 ppb to 340 ppb (range)
2,4,5-TCP	1400 ppb



068521228
B. H. S., inc.

INDUSTRIAL WASTE
LANDFILL
Route 1, Box 116F
Wright City, Mo. 63390
314-745-3371

File
Ok as amended

August 11, 1981

EPA-ARHM/HAZM

AUG 27 1981

Region VII K.C., MO

Mr. Dennis Degner
Hazardous Materials Branch
USEAP Region VII
224 East Eleventh Street
Kansas City, Missouri 64106

RE: Amendment to Bob's Home Service, Inc., Part A Hazardous Waste Facility Permit Application

Dear Mr. Degner:

It is requested that the following amendments be made to Part A of the BHS, Inc. application as filed on 19 September 1980.

Four liquid evaporation basins were indicated in the southwest corner of Area I. Plans for the four basins had been submitted to the Missouri Department of Natural Resources and approval to construct and operate them was expected. Unfortunately, changes were made in the Missouri regulations which delayed approval of the plans and the basins were not constructed. Potentially contaminated liquids generated from site operations is currently stored in two surface impoundments located in approximately the same area as that shown for the evaporation basins. Aeration is provided to prevent septic conditions and as an aid to evaporation. Both impoundments have been in operation for several years.

In the past, potentially contaminated liquid has been spray irrigated over completed parts of the landfill with MDNR approval. Due to uncertainty about the status of this liquid with respect to Missouri regulations this practice was temporarily halted and, inadvertently, was not listed as a treatment option in the 19 September 1980 submission. Recent changes in Missouri regulations have clarified this issue and it is anticipated that a spray irrigation system will again be used. The system has been designed at a relatively low application rate and total application will be consistent with irrigation deficits for grassland in this area of the state; neither deep percolation nor runoff is anticipated. Please note the addition of this previously used option to available site treatment alternatives.

We have been in contact with Mr. Dave Doyle of EPA Region VII concerning these matters. He suggested that you might want to contact him for further details. I am available to answer questions directly at 314-875-4618.

11. The slough area is an abandoned meander of the Spring River part of which is immediately adjacent to the east side of the lagoons described in paragraph 9 and which has received spillage and contaminated fill material from these lagoons. (See Attachment 1.) This area is in the floodplain of the Spring River.

12. The Respondent's 3013 report has reported the following total TCDD concentrations in the slough area at the facility:

Total TCDD	0.29 to 2.3 ppb (range)
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13. The burn area is located on the south end of the facility in the floodplain of the Spring River, approximately 160 feet from that same river. (See Attachment 1.) The area was used to burn various wastes resulting from the activities of the facility.

14. The Respondent's 3013 report has reported the following total TCDD concentrations at the burn area (See Attachment 4.):

Total TCDD	0.19 ppb to 24 ppb (range)
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15. The NEPACCO irrigation area is located next to Building V-11 at the facility, in the floodplain of the Spring River, approximately 370 feet from that same river. (See Attachment 1.). This area was sprayed or irrigated with process wastewater.

CSC

September 18, 1981

Mr. Michael Gill
Manager
Bob's Home Service, Inc.
R. R. 1, Box 116F
Wright City, Missouri 63390

EPA I.D. No. MOP068521228

Dear Mr. Gill:

We have reviewed Mr. Ben Moore's letter of August 11, 1981, concerning changes to the Part A application for Bob's Home Service, Inc. To amend the application to correctly include equipment and processes in use prior to November 19, 1980, please fill out the appropriate sections of the enclosed Part A application to include the revisions discussed in Mr. Moore's letter. Refer to Form 3 instructions (page 3-2) for details. The revised application form should be signed by the same officials who signed the previous Part A. You should document on the revised form that the surface impoundments and irrigation system were being used to handle hazardous waste prior to November 19, 1980. Also, please enclose any applicable photographs, etc.

Please refer to the September 11, 1981, letter from Ms. Louise Jacobs of this Agency for our comments concerning the use of the spray irrigation system.

If you have any questions concerning this matter please contact me at (816) 374-6531.

Sincerely yours,

Robert Stewart
Environmental Engineer
Technical Support Section
Hazardous Materials Branch
Air and Hazardous Materials Division

Enclosure

cc: John Doyle, MDNR

16. The Respondent's 3013 report reported the following total TCDD concentrations at the NEPACCO irrigation area and EPA split sample analysis has found 2,4,5-TCP at this location (See Attachment 5.):

Total TCDD	0.14 ppb to 29 ppb (range)
2,4,5-TCP	200 ppb

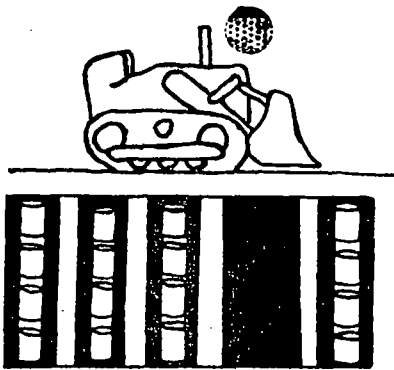
17. The spill area is located near a steel tank designated T-24 at the facility approximately 520 feet from the Spring River in the floodplain of that same River. (See Attachment 1). The area resulted from a spill of contaminated wastewater.

18. The following substance has been found at the given concentration (expressed in parts per trillion (ppt)) in the spill area:

Total TCDD	13 ppt
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19. The lagoons, slough, burn, irrigation and spill areas exist in alluvial materials composed of sand, gravel, silt and clay which would have zones of highly permeable materials lending to the movement of substances from the facility by erosion, flooding and/or leaching.

20. TCDD is carcinogenic (a suspected or proven cancer causing agent in humans and/or animals), teratogenic (causes abnormal development of the fetus, including deficient, redundant, misplaced or grossly misshapen body parts), mutagenic (causes changes in genes or an organism that are perpetuated in subsequent cell divisions or offspring of the organism), and fetotoxic (causes death or other adverse health effects in fetuses) in very minute



B. H. S., inc.

INDUSTRIAL WASTE
LANDFILL

Route 1, Box 116F
Wright City, Mo. 63390
314-745-3371

October 13, 1981

Mr. Robert Stewart
Hazardous Materials Branch
U. S. Environmental Protection Agency
Region VII
324 East Eleventh Street
Kansas City, Mo. 64106

Dear Mr. Stewart:

As per your letter of September 18, 1981, attached please find Revised Form 3 of Application "A", together with a Site Diagram delineating surface impoundments and past, present and future disposal areas.

Please note changes to Form 3 as follows:

Removal of T01 process code replaced by
T02 process code.

Brief explanation of previously used
spray irrigation system.

Additional wastes disposed of and estimated
quantities.

If you have any questions, please give me a call.

Very truly yours,

Michael D. Gill

Michael D. Gill
Manager

Mike called 11/24/81

he will add D81

and make a new line for D000-leachate

MDG/ph

enc.

showing that quantity is 702-D81
The rest is landfilled.

RLS

rec'd
RLS
10/14/81

amounts. Its acute (short term) effects include skin lesions (or chloracne), vertigo, muscle pain, irritability, fatigue, and liver enlargement. It is persistent and bioaccumulative in the environment.

21. 2,4,5-trichlorophenol (TCP) is carcinogenic and toxic. TCP is bioaccumulative and persistent in the environment. At high exposure concentrations, TCP may cause liver and kidney damage.

22. The facility is an active manufacturing plant. Facility personnel are potentially exposed to the substances found at these areas through inhalation and skin absorption.

23. The Spring River traverses the facility. Substances from the facility can and do enter the river through leaching, flooding, and precipitation runoff. In November and December of 1982, a dye test was initiated in a backhoe trench near the slough area of the facility. The resultant movement of dye to the Spring River and slough area during this test procedure demonstrated the susceptibility of the area to the movement of substances through alluvial materials to the Spring River. Analysis of sediment samples taken by EPA from various locations in the Spring River downstream from the facility show concentrations of 2,3,7,8-TCDD to 12 ppt. (See Attachment 2.)

24. Analysis of fish samples taken from various locations in the Spring River both above and below the Syntex facility show an average high concentration of 2,3,7,8-TCDD at 40 ppt in fish filets. (See Attachment 6.)

RECORD OF COMMUNICATION		<input checked="" type="checkbox"/> PHONE CALL <input type="checkbox"/> DISCUSSION <input type="checkbox"/> FIELD TRIP <input type="checkbox"/> CONFERENCE <input type="checkbox"/> OTHER (SPECIFY)	
(Record of item checked above)			
TO: Mike Gill CHS	FROM: Bob Stewart	DATE 11-17-81	TIME
SUBJECT: Revised Part A			
SUMMARY OF COMMUNICATION <ol style="list-style-type: none"> 1. Mike said that U13 should not have been changed to U12; it was a typo and I corrected it. 2. He indicated that the 58.9 acre-feet of landfill equalled the area in Area 1 remaining to be filled on Nov-19, 1980. He used 25' trench depth in the calculation. I agree. 3. He also said that F017 should never have listed T01 as a process on the original Part A; this mistake was corrected on the revision. 			
CONCLUSIONS, ACTION TAKEN OR REQUIRED			
INFORMATION COPIES			

25. With knowledge of the data in paragraph 25, the Missouri Division of Health issued a public health advisory in March, 1982, advising the residents of southwest Missouri to limit their consumption of fish from the Spring River.

CONCLUSIONS OF LAW

26. TCDD is a "hazardous substance" as defined by Section 101(14) of CERCLA, 42 U.S.C. 9601(14).

27. TCP is a "hazardous substance" as defined by Section 101(14) of CERCLA, 42 U.S.C. 9601(14).

28. The facility described herein is a "facility" as defined by Section 101(9) of CERCLA, 42 U.S.C. 9601(1).

29. The disposal, spilling, leaching, and/or depositing into the environment described herein is a "release" as defined by Section 101(22) of CERCLA, 42 U.S.C. 9601(1).

DETERMINATION

30. Based on the above and foregoing facts, the undersigned has determined that the actual or threatened release of hazardous substances from this facility may be an imminent and substantial endangerment to the public health or welfare or the environment, and the following immediate action is necessary to protect the public health, welfare or the environment.

8. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

PERICLAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

2. **INFECTIOUS WASTES.** Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary
labs, medical and research laboratories your installation handles. Use additional sheets if necessary.

CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

CONITABLE

☐ 3. REACTIVE
(0003)

☒ 4. TOXIC
(0000)

under penalty of law that I have personally examined and am familiar with the information submitted in this and all documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for sub-
false information, including the possibility of fine and imprisonment.

NAME & OFFICIAL TITLE (type or print)

DATE SIGNED

700-12 (6-80) REVERSE

Michael D Gull

ORDER

31. It is hereby ordered and directed that the Respondent undertake the activities described below pursuant to the schedules established below to further define, contain, mitigate, and/or terminate the actual or threatened release of hazardous substances from the facility.

Syntex Facility

32. Within ten (10) days from the effective date of this order, Respondent shall post warning signs at all areas where TCDD is known to exist at the facility and maintain present or more stringent facility security. These posted areas shall include, at a minimum, the five areas described in the Findings of Fact above. The warning signs shall be printed with the legend "Danger - Keep Out" or other legend as may be approved by EPA. The signs shall be weather resistant, readable at night, and posted in a manner that clearly identifies the contaminated areas.

33. Within thirty (30) days of the effective date of this Order, Respondent shall develop and submit to EPA for approval a plan for fully defining the extent and nature of hazardous substance(s) contamination from known sites of contamination in the floodplain, from other areas in the floodplain on the plant site, and at the Syntex trenches. At a minimum the plan shall address total TCDD and TCP contamination and shall provide for sampling and analysis of soil, air, leachate and groundwater at the above named areas as well as background areas at the facility. The plan shall further provide for surveying to locate contaminated areas and background sampling locations relative to a standard datum. The plan shall provide a schedule for implementation of the scope of work described therein and periodic and final reporting to EPA.

File
CSC

November 19, 1981

Mr. Michael D. Gill, Manager
Bob's Home Service, Inc.
Route 1, Box 116F
Wright City, Missouri 63390

Dear Mr. Gill:

We have reviewed your October 13, 1981, letter transmitting a revised Part A application for the above facility. The revisions made are acceptable and are hereby approved; however, two additional changes appear necessary.

OK 1. Since the spray irrigation system is a disposal method until the leachate is delisted, page 1 of Form 3 should list D81, land application, as a process used at the facility. Likewise, on page 3A, waste D000 should include D81 as a process code.

OK 2. The design capacity of the surface impoundments is listed as 123 gallons per day, while the annual quantity of leachate is shown as 16,160 tons. At 62.4 pounds per cubic foot of leachate and 123 gallons per day, we calculate only 187 tons per year. Please reconcile these figures.

We are returning your revised application for the above changes. Please correct and resubmit the application to us.

If you have any questions concerning this matter, please contact Bob Stewart at 816-374-6531.

Sincerely yours,

Robert L. Morby
Chief, Hazardous Materials Branch
Air and Hazardous Materials Division

Enclosure

new, safe

34. Within ninety (90) days from approval of the plan order in paragraph 33 above, Respondent shall prepare and submit to EPA a remedial alternatives report which identifies and evaluates alternatives to remedy the hazardous substance contamination at the facility consistent with Section 300.68 of the National Contingency Plan (Federal Register, July 16, 1982). This report shall recommend remedial action(s) for all contamination at the facility.

35. Within forty-five (45) days of approval by EPA of remedial action(s), Respondent shall prepare and submit to EPA for approval detailed plans and specifications for implementation of the action(s). The plans and specifications shall include but not be limited to a schedule of implementation, periodic and final reporting to EPA, content of said reports, safety plans, and sampling plans to verify completeness of the remedy.

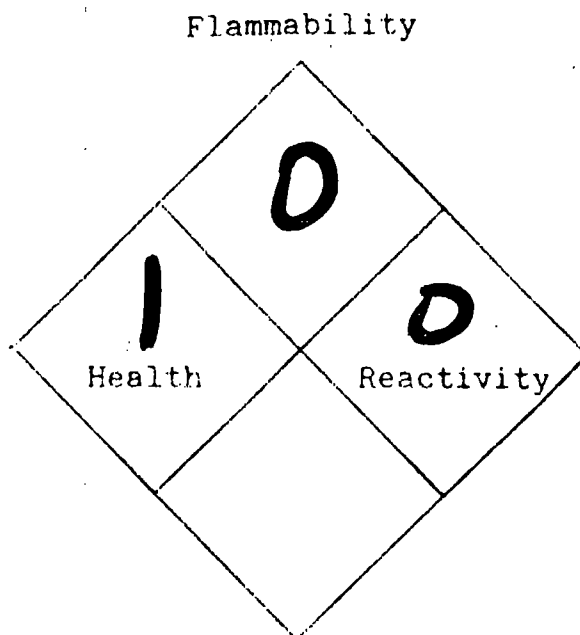
36. Upon approval by EPA, Respondent shall implement said plans and specifications according to the schedule set forth therein.

Spring River Basin

37. Within thirty (30) days of the effective date of this order, Respondent shall develop and submit to EPA for approval a plan for fully defining the extent and nature of contamination from hazardous substance(s) released from the facility into the Spring River and adjoining floodplain. At a minimum the plan shall address total TCDD and TCP contamination. At a minimum, the plan shall provide for sampling and analysis of sediments in the sinks of the Spring River, sediments in the Carthage Reservoir, river sediment deposits in the low areas of the Spring River floodplain, and fish and other aquatic life,

SAFETY DATA SHEET

- 0 - No Hazard
- 1 - Minor Irritation
- 2 - Hazard with long exposure
- 3 - Hazard with short exposure
- 4 - Hazard immediately with exposure



erator I.D. # Olin Brass 01212

te Description (I.D.#) MRF Sump Sludge 003

dling Requirements Rubber gloves and glasses

ll Requirments Wash exposed skin with soap and water. Flush eyes

15 minutes. Shovel back into container

cial Instructions Incompatible with strong acids

posal Area Alkaline Area

including mussels, benthic organisms, and crayfish in the Spring River and Carthage Reservoir. The plan shall further include sampling of Spring River aquatic organisms until a definitive downward trend in contamination is established over a minimum five (5) year period.

38. Within one hundred eighty (180) days of the effective date of this order, Respondent shall prepare and submit to EPA for approval a remedial alternatives report which identifies and evaluates alternatives to remedy contamination resulting from hazardous substances released from the facility consistent with Section 300.68 of the National Contingency Plan. The report shall recommend remedial action(s) for all such contamination.

39. Within sixty (60) days of approval by EPA of remedial action(s), Respondent shall prepare and submit to EPA for approval detailed plans and specifications for implementation of the remedial action(s). The plans and specifications shall include but not be limited to a schedule of implementation, periodic and final reporting to EPA, content of said reports, safety plans, and sampling plans to verify completeness of the remedy.

40. Upon approval by EPA, Respondent shall implement said plans and specifications according to the schedule set forth herein.

Effective Date

41. This order shall be effective immediately upon receipt by Respondent of a fully executed copy thereof.

EPA I.D. NUMBER (enter from page 1)

FOR OFFICIAL USE ONLY

W	M	0	D	0	6	8	5	2	1	2	2	8	T	A	C	1
13	14	15														

5											T	A	C	2				
W	DUP												2	DUP				
13	14	15											13	14	15	16	17	18

IV DESCRIPTION OF HAZARDOUS WASTES (continued)

A. EPA HAZARD WASTE NO. (enter code)		B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES							
				1. PROCESS CODES (enter)							
				2. PROCESS DESCRIPTION (if a code is not entered in D(1))							
U	1 4 7	40	T	D	80						
D	0 0 4	20	T	D	80						
D	0 0 0	200	T	D	81	T	0	2			

3510.3 (6-80)

CONTINUE ON REVERSE

Opportunity to Confer

42. The Respondent may request a conference with the Regional Administrator of Region VII to discuss the order, its applicability to Respondent, the correctness of any factual determination upon which the order is based, the appropriateness of any action Respondent is ordered to take, and any other relevant and material issue. Such request must be made within 48 hours of receipt of this order by the Respondent with respect to those activities required by paragraph 3 of the order and within 14 days of receipt of this order by the Respondent with respect to those activities required by paragraphs 32-39 of the order. Any oral request for a conference must be confirmed in writing and received by EPA Region VII within five (5) working days from the date of oral request. The request for conference does not automatically stay the effective date of the order. The Regional Administrator may designate a representative to confer with the Respondent. Respondent should contact Jane B. Werholtz, Office of Regional Counsel, 324 East 11th Street, Kansas City, Missouri 64106, (816) 374-3171 to request a conference.

Other Action

43. Nothing contained in this order shall be construed to prevent EPA from seeking legal or equitable relief to enforce the terms of this order or from taking other action it deems appropriate or necessary to protect the public health or welfare or the environment. Respondent may be liable under Section 107(a) of CERCLA for the costs of any activities so undertaken by the United States Government.

continued from the front.

DESCRIPTION OF HAZARDOUS WASTES (continued)

USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

A.I.D. NO. (enter from page 1)

0068521228

SCALE DRAWING

Facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

PHOTOGRAPHS

Facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

38 47 01.5

LONGITUDE (degrees, minutes, & seconds)

091 02 04.5

FACILITY OWNER

If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

LaVerne Zykan

2. PHONE NO. (area code & no.)

314-745-3401

3. STREET OR P.O. BOX

Route 1, Box 116-F

4. CITY OR TOWN

Wright City

5. ST.

Mo.

6. ZIP CODE

63390

OWNER CERTIFICATION

I, under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

(print or type)

LaVerne Zykan

B. SIGNATURE

LaVerne Zykan

C. DATE SIGNED

9/9/80

OPERATOR CERTIFICATION

I, under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

(print or type) Bob's Home Service

(a Missouri Corporation) BY: LaVerne Zykan

B. SIGNATURE

Glenn W. Zykan
President

C. DATE SIGNED

9/9/80

Corporate Officer
5/5/81

Access

44. It is the responsibility of Respondent to obtain access to and use of all areas addressed by the order. Respondent assumes full responsibility for any claims arising from the activities conducted by Respondent or its representatives on property owned by others in connection with this order.

45. Respondent shall provide access to the facility and Spring River Basin for EPA employees, contractors or consultants of EPA at all reasonable times and shall permit such persons to be present and move freely in the area where any work is being conducted pursuant to this order. Furthermore, Respondent shall provide EPA with copies of all charts, maps, letters, memoranda, invoices, shipping manifests or other records or documents considered by EPA to be germane to the subject matter of this order. Any information requested pursuant to this order must be provided notwithstanding its possible characterization as confidential business information. Respondent may request at the time of submitting information that such information be treated as confidential business information, pursuant to the provisions of 40 C.F.R. Part 2.

Sample Splitting

46. Upon request, Respondent shall make available to EPA a split of all samples taken pursuant to this order.

PROCESSES (continued)

SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

Note: The Treatment Tank indicated consists of Four (4) concrete Evaporation Basins. These evaporation basins are only for the treatment of leachate and rainwater in active trenches, and from a truck wash slab for hosing off external parts of a truck.

DESCRIPTION OF HAZARDOUS WASTES

HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you have hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristic or the toxic contaminants of those hazardous wastes.

ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled on an annual basis that characteristic or contaminant.

UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate abbreviations are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS.....	P	KILOGRAMS.....	K
TONS.....	T	METRIC TONS.....	M

If records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

PROCESS CODES:

Listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

Non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Notes: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the fourth space of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

Enter one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.

In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.

Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are ignitable and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

EPA HAZ. WASTE NO. (code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
			1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
054	900	P	T 0 3 D 8 0	
002	400	P	T 0 3 D 8 0	
001	100	P	T 0 3 D 8 0	
002				included with above

Exchange of Information

47. All plans, specifications, and reports required under this order shall, upon completion, be delivered to the following EPA employee:

Jane B. Werholtz
Office of Regional Counsel
324 East 11th Street
Kansas City, Missouri 64106.

Compliance with Applicable Statutes and Regulations

48. All actions undertaken pursuant to this order by Respondent or its representative shall be in accordance with all applicable federal, state, and local laws and regulations.

Amendment

49. This order may be amended by the undersigned as required. Such amendment shall be in writing and fully executed. Amendments shall be effective upon receipt by Respondent of a fully executed copy unless otherwise provided.

Penalties for Non-Compliance

50. Respondents are advised that willful violation or subsequent failure or refusal to comply with this Order or any portion thereof may subject Respondents to a civil penalty of not more than \$5,000 for each day in which such violation occurs, or such failure to comply continues. Failure to comply with this Order or any portion thereof without sufficient cause may also subject Respondents

lease print or type in the unshaded areas only
(fill-in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

FORM
3
RCRA



HAZ. WASTE PERMIT APPLICATION
Consolidated Permits Program
(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

FMOD068521228

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

☒ 1. EXISTING FACILITY (place an "X" below and provide the appropriate date)

(See instructions for definition of "existing" facility. Complete item below.)

YR. MO. DAY
77 05 25

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

☐ 2. NEW FACILITY (Complete item below.)

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR. MO. DAY
77 05 25

☐ 1. FACILITY HAS INTERIM STATUS

N/A

☐ 2. FACILITY HAS A RCRA PERMIT

PROCESSES - CODES AND DESIGN CAPACITIES

PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

AMOUNT - Enter the amount.

UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
STORAGE TANK	S01	GALLONS OR LITERS
PILE	S02	GALLONS OR LITERS
	S03	CUBIC YARDS OR CUBIC METERS
IMPONDMNT	S04	GALLONS OR LITERS

WELL	D79	GALLONS OR LITERS
WELL	D80	ACRE-Feet (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER
APPLICATION	D81	ACRES OR HECTARES
AN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
IMPONDMNT	D83	GALLONS OR LITERS

Treatment:

TANK
SURFACE IMPONDMNT
INCINERATOR

OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
---------	--------------	--

T01 GALLONS PER DAY OR LITERS PER DAY
T02 GALLONS PER DAY OR LITERS PER DAY
T03 TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
T04 GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U

UNIT OF MEASURE	UNIT OF MEASURE CODE
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H

UNIT OF MEASURE	UNIT OF MEASURE CODE
ACRE-Feet	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

DUP

T/A/C
1

LINE	PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)				1. AMOUNT	2. UNIT OF MEASURE (enter code)	
X-1	02	600	G		5				
X-2	03	20	E		6				
	30	58.9	A		7				
	01	123	U		8				
					9				
					10				

to liability for punitive damages in an amount three times the amount of any cost incurred by the government as a result of Respondents' failure to take proper action.

IT IS SO ORDERED

U.S. Environmental Protection Agency

Date

DESCRIPTION OF HAZARDOUS WASTES (continued)

USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

A I.D. NO. (enter from page 1)											
D	0	6	8	5	2	1	2	2	8	T/A	C
										6	

CITY DRAWING

g facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

PHOTOGRAPHS

g facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)						LONGITUDE (degrees, minutes, & seconds)					
	3	8		4	7		0		1	5	
65	66		67	68	69 - 71	72 - 74	75	76	77 - 79		

FACILITY OWNER

If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER						2. PHONE NO. (area code & no.)					
Verne Zykan						314-745-3401					
3. STREET OR P.O. BOX				4. CITY OR TOWN		5. ST.		6. ZIP CODE			
Route 1, Box 116-F				G Wright City		MO		63390			

OWNER CERTIFICATION

Under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

(print or type)

B. SIGNATURE

C. DATE SIGNED

Verne Zykan

Verne Zykan

10-12-81

OPERATOR CERTIFICATION

Under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

(print or type) Glennon W. Zykan

B. SIGNATURE

C. DATE SIGNED

President, Bob's Home Se

Glennon W. Zykan

10-12-81

Missouri corporation